

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiff

v.

AHSHA NATEEF TRIBBLE [1]
Defendant

Criminal No. 19-541 (FAB)

MOTION FOR JOINDER

TO THE HONORABLE COURT:

COMES NOW defendant Ahsha Nateef Tribble, by and through the undersigned attorneys, and respectfully joins the *REPLY IN SUPPORT OF MOTION TO TRANSFER VENUE* filed by co-defendant Donald Keith Ellison [Docket No. 101-1]. In support thereof, the defendant states and prays:

1. Ms. Tribble and Mr. Ellison are charged in six of the same counts of the Indictment filed in this matter. [Docket 3].
2. The Motion to Transfer Venue [Docket No. 101-1] addresses the issues and concerns that may impede Ms. Tribble and/or Mr. Ellison from having a “fair and impartial” jury trial in the District of Puerto Rico.
3. The issues, arguments and caselaw thoroughly addressed in the REPLY IN SUPPORT OF MOTION TO TRANSFER VENUE are highly relevant to both defendants and joinder by Ms. Tribble would save judicial resources. [See docket 98]

WHEREFORE, it is respectfully requested that the Court grant this Motion for Joinder.

CERTIFICATE OF SERVICE: I hereby certify that on April 11, 2020, I electronically filed the foregoing Motion for Joinder with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on April 11, 2020.

s/Deana Timberlake-Wiley
Deana Timberlake-Wiley
(*Pro Hac Vice*)
Simmons, Finney & Winfield, LLC
741 W. Lanier Avenue
Suite 220
Fayetteville, GA 30214
Office: 678-788-6030
Email: dwiley@sfwlegalteam.com
Counsel for Ahsha N. Tribble

s/juan r. acevedo-cruz
JUAN R. ACEVEDO-CRUZ (120701)
Suite 501-A
Banco Cooperativo Plaza
623 Ave. Ponce De León
San Juan PR 00917
Tel/Fax (787) 751-2341
Email: ir@jracevedo.com
Counsel for Ahsha N. Tribble